



June 1, 2005

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Dear Ms. Condray:

I am writing to comment to proposed amendments to 45 CFR 1611: Financial Eligibility. My comments follow:

1611.3(d)(1) - I believe the list of asset exclusions should be illustrative and not exclusive. If that comment is not accepted, then I suggest:

(1) Vehicle(s) should not be limited to those required for work. Non-working elders or the non-working disabled should not be penalized. Non-working elders and the non-working disabled need vehicles for shopping, going to doctor appointments, etc. and value of those vehicles, which may be readily convertible to cash, should not preclude them from getting free legal services.

(2) Normal household furnishings should be exempt. Although it is probably arguable that these are not readily convertible to cash, it would be clearer to just list that as an allowable exception.

If the list of permissible assets were illustrative rather than exclusive, questions would not arise about examples such as those listed above, as programs could deal with these in their program financial eligibility guidelines.

Sincerely yours,

Richard C. Woltmann
Executive Director

RCW/rf

